

OREGON LIQUOR CONTROL COMMISSION

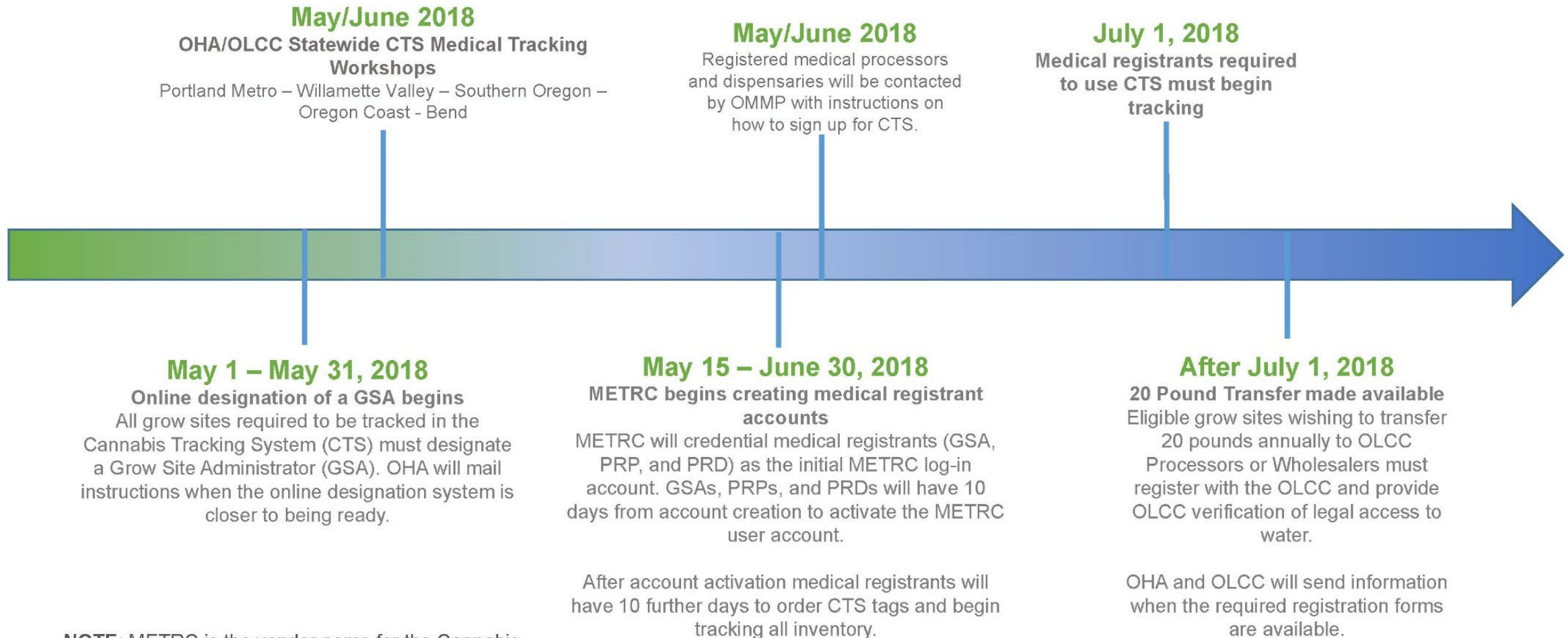
Medical Marijuana Tracking Program



Cannabis Tracking System and Common GSA Errors
January 2019

OHA and OLCC Medical Tracking 2018 Timeline

For More information about registrants required to track product in CTS please visit OHA's website: [Changes Affecting OMMP Growers, Processors and Dispensaries](#)



NOTE: METRC is the vendor name for the Cannabis Tracking System (CTS) in Oregon.



Overview

- Senate Bill 1057 (2017, incorporated into ORS 475B) required medical marijuana grow sites producing marijuana for 3 or more patients to track marijuana in the OLCC's cannabis tracking system (CTS/"Metrc") starting July 1, 2018. All medical marijuana processing sites and dispensaries are also subject to tracking.
- OLCC and the Oregon Health Authority (OHA) began granting CTS access to these sites in June 2018.
- As of January 2019 facilities subject to tracking in CTS include:
 - **865 grow sites**
 - **3 processing sites**
 - **5 dispensaries**



Education Focus

- The vast majority (99%) of medical facilities in CTS are grow sites.
- Processing sites and dispensaries can use existing recreational marijuana program guidance on CTS tracking requirements due to substantially similar requirements and operations.
- Grow sites operate in significantly different ways than recreational marijuana Producers.
- The OLCC Medical Marijuana Tracking Program educational efforts have focused on providing resources for the 99% of medical marijuana sites subject to CTS tracking that require specific, tailored education.



Outreach Efforts

- 2017-2018: Oregon Health Authority outreach to medical marijuana sites that would be subject to tracking.
- Spring 2018: Multi-agency series of “road shows” to educate and connect with medical marijuana registrants.
- Spring-Summer 2018: OHA and OLCC published electronic guidance and compliance bulletins through web-sites and email.
- Summer-Winter 2018: OLCC phone outreach and site visits to provide education and additional training on tracking requirements to bring remaining sites into compliance.

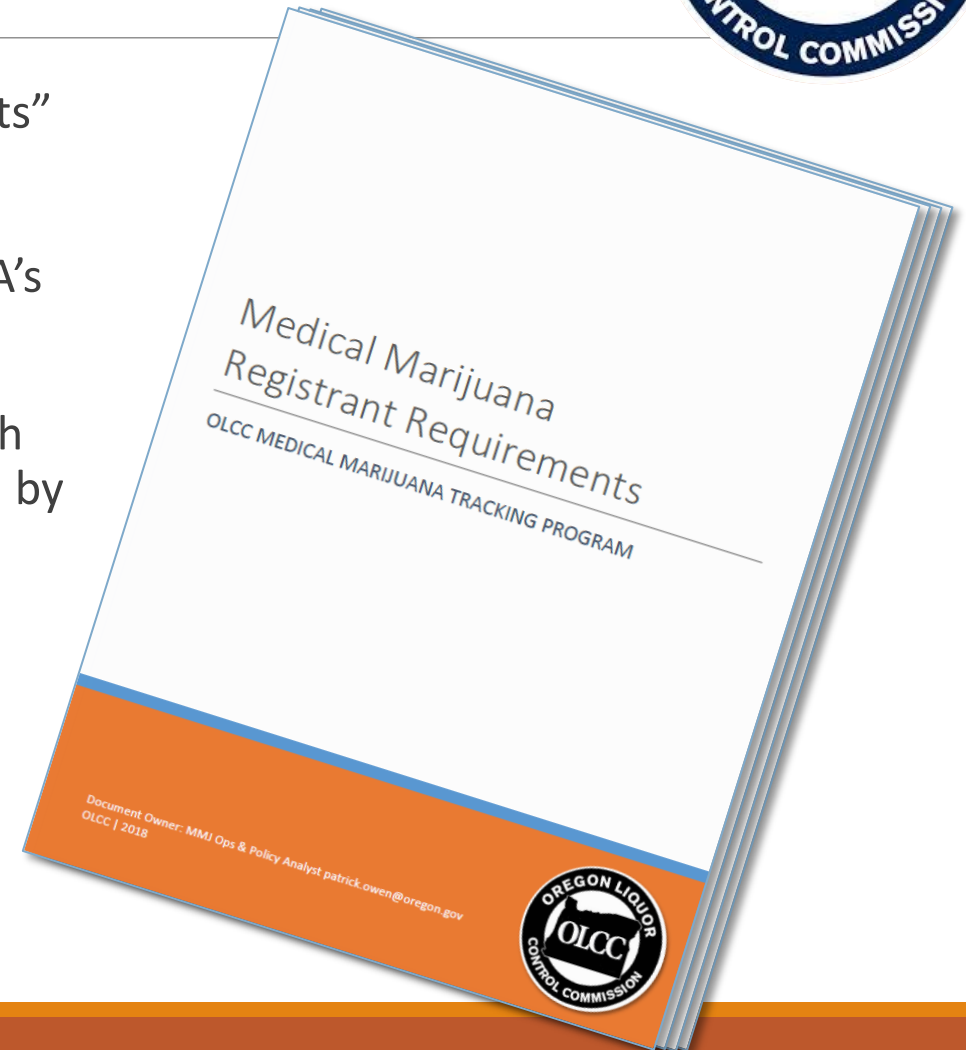
Current Efforts



- January 2019: OLCC published a “Registrants Requirements” guide for grow site operators subject to CTS tracking. This document includes instructions on meeting CTS requirements as well as operational requirements for OHA’s medical marijuana program generally.
- January 2019: A “wiki” website is available for CTS for both medical & recreational marijuana. Articles are maintained by OLCC and CTS staff at

wiki-or.metr.com

- OLCC inspectors proactively visit medical marijuana grow sites for compliance checks and educational contacts in addition to data-driven compliance inspections.





Current Efforts Continued

- OLCC's Medical Marijuana Tracking Program's goal is to ensure that each medical site subject to tracking in CTS receives a site visit from an Inspector at least once a year. (Proactive inspections)
- Additional inspections may occur based on analysis of CTS data or other factors. (Reactive inspections)
- Inspectors review grow sites for accuracy of tracking as well as other grow site requirements, such as posting of grower cards.
- The goal of an inspection is always to assist the growers in staying in compliance with rule and statutory requirements. Inspectors provide education and resources to help growers accomplish this goal.



Medical Marijuana Tracking Program Common Errors



The Basics

- Tracking in CTS is a statutory and rule requirement. Grow sites that continue to produce marijuana for 3 or more patients (i.e.: are authorized to produce more than 12 mature marijuana plants) **must** track in CTS.
- Tracking in the Oregon Medical Marijuana Online System (OMMOS) is **not an option** for these sites unless registration status changes to fewer than 3 patients.
- Even if a pending change is underway, until it is completed, an address designated by 3 or more patients as a grow site must still have a grow site administrator (GSA) and must track in CTS.
- Failure by the GSA to track in CTS may result in revocation of all grower registrations at the address, regardless of whether the marijuana they were producing was being tracked or not.



Failure to Track Marijuana

- Many operators activate the CTS account, and even order and receive the unique identification (UID) tags, but never enter anything into CTS.
- A grow site with zero marijuana on site in CTS during the growing/harvest is unusual.
- Tracking includes all marijuana related to the growing operation.
 - Clones are plants.
 - Harvests are tracked.
 - Seeds are marijuana items.



Reporting as the Wrong “Role”

- Many growers are patients themselves.
- CTS represents the activity of the *growers*.
- If a grower takes possession of marijuana as a patient, that is a ***transfer***.
- Growers can't provide marijuana to a patient they don't grow for, but a patient may share marijuana with other patients.
- If sharing marijuana as a patient, that occurs outside CTS ***after*** the marijuana has been transferred from the grower to that grower's patient.
- A grower transferring to a patient that the grower doesn't produce marijuana for will be viewed and investigated.



Failing to Reconcile Daily

- Tracking rules require daily reconciliation in CTS.
- Inventory must be accurate at the start of each day.
- Transfers must be set up in CTS before they occur and then recorded as completed.
- This is a significant change compared to previous monthly reporting requirements under OMMOS and requires that the GSA coordinate with any other growers on site to ensure accurate entry.



Failing to Take Training

- The GSA for a grow site is required to take training in use of CTS.
- Failing to take training does not exempt a GSA from accurate tracking in CTS.
- Training can be retaken as needed/desired.
- An “advanced” Producer training is available providing more information on grow site-specific tracking requirements.
- Metrc support is available to walk users through recording specific activities.
- Sign up for training at <https://www.metrc.com/oregon>



Operational Violations

- In addition to CTS requirements, Inspectors will also check a site for compliance with other requirements. At a grow site, these include:
 - Identifying plants and usable marijuana by the patient it belongs to.
 - Posting **current and valid** grower cards for all growers producing marijuana at that site.
 - Staying at or under the maximum plant and usable marijuana limits for the number of patients and the zoning/location of the site.
 - Use of Department of Agriculture licensed scales for weight entry into CTS.



Online Resources - OLCC

- **OLCC Marijuana Hotline**
 - **503-872-6366**
 - General questions regarding compliance with OLCC rules and regulations
- **OLCC CTS email**
 - cts.marijuana@oregon.gov
 - Questions about compliance with the CTS tracking requirements
- **Metrc Support**
 - **1-877-566-6506**
 - Questions about specific features and performing specific actions in CTS
 - Sign up for training at www.metrc.com/oregon
- **OLCC Website**
 - www.oregon.gov/olcc
 - Links to resources and guides for the “OMMP Marijuana Tracking Program”

OLCC'S MISSION

Support businesses, public safety,
and community livability
through education and the enforcement
of liquor and marijuana laws.

